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25 **ATTORNEYS FOR DEFENDANTS**  
26 **DULUTH NEWS TRIBUNE AND JIMMY LOVRIEN**  
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30 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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DANIEL VICTOR HANCOCK, an individual,

Plaintiff,

vs.

JIMMY LOVRIEN, an individual, DULUTH NEWS TRIBUNE, LLC, a Minnesota Limited Liability Company, and ROE CORPORATIONS I through X, inclusive,

Defendants.

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Case No. 2:24-cv-369-CDS-NJK

**REPLY MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

## **REPLY MEMORANDUM OF POINTS AND AUTHORITIES**

2 Defendants Duluth News Tribune (“Duluth News”) and Jimmy Lovrien (“Lovrien”)  
3 respectfully submit this Reply Memorandum of Points and Authorities in support of their  
4 Motion to Dismiss for lack of Personal Jurisdiction. Local Rule LR 7-2(b), states in relevant  
5 part: “For all other motions [excluding a motion for summary judgment], the deadline to file  
6 and serve any points and authorities in response to the motion is 14 days after service of the  
7 motion.” The Notice of Motion, Motion, and Memorandum of Points and Authorities in  
8 Support of Motion to Dismiss for Lack of Personal Jurisdiction was filed with the Court on  
9 June 20, 2024. Applying Federal Rule Civil Procedure 6, a response was due on July 5, 2024.  
10 No response was filed with this court. This Reply was then due seven days later on July 12,  
11 2024.

12 Under Local Rule LR 7-2, “[t]he failure of an opposing party to file points and  
13 authorities in response to any motion, except a motion under Fed. R. Civ. P. 56 or a motion for  
14 attorney’s fees, constitutes a consent to the granting of the motion.” Accordingly, Duluth News  
15 and Lovrien respectfully request the Court grant the Motion to Dismiss for Lack of Personal  
16 Jurisdiction.

17 Dated this 12th day of July, 2024.

/s/ Jordan B. Weir  
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**DULUTH NEWS TRIBUNE AND JIMMY**  
**LOVRIEN**

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of WOLFENZON ROLLE, and  
hereby certify that on this 12<sup>th</sup> day of July, 2024, **REPLY MEMORANDUM OF POINTS AND**  
**AUTHORITIES IN SUPPORT OF MOTION TO DISMISS FOR LACK OF PERSONAL**  
**JURISDICTION**, was filed and served via the United States District Court CM/ECF system on all  
parties or persons requiring notice.

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20 *Attorneys for Defendants,*  
21 DULUTH NEWS TRIBUNE  
and JIMMY LOVRIEN

/s/ Walter Monge  
An employee of WOLFENZON ROLLE